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January 28, 1998

Re: Indian Point Unit No. 2
Docket No. 50-247-
LER 97-25-00

Document Control Desk
US Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555-0001

The attached Licensee Event Report LER 97-25-00 is hereby submitted in accordance with the requirements of 10 CFR 50.73

Very truly yours,

Paul H. Kinkel

Attachment

cc: Mr. Hubert J. Miller
Regional Administrator-Region I
US Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. Jefferey F. Harold, Project Manager
Project Directorate I-1
Division of Reactor Projects I/II
US Nuclear Regulatory Commission
Mail Stop 14B-2
Washington, DC 20555

Senior Resident Inspector
US Nuclear Regulatory Commission
PO Box 38
Buchanan, NY 10511

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PDR ADDCK 05000247
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LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Indian Point No. 2	DOCKET NUMBER (2) 0 5 0 0 0 2 4 7	PAGE (3) 1 OF 0 4
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TITLE (4)
Inadequate Surveillance Requirements For Radioactive Liquid Effluent Monitoring Instrumentation

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES		
1	2	9	9	7	0	0	1	8	NONE		
2	2	9	9	7	0	0	1	8	DOCKET NUMBER(S) 0 5 0 0 0		

OPERATING MODE (9)	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFRs: (Check one or more of the following) (11)				
POWER LEVEL (10) 0 0 0	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)	
	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)	
	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> OTHER (Specify in Abstract below and in Text, NRC Form 336A)	
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)		
	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)		
<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)			

LICENSEE CONTACT FOR THIS LER (12)

NAME Richard T. Louie, Senior Engineer	TELEPHONE NUMBER
	AREA CODE: 9 1 4 7 3 4 - 5 6 7 8

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

<input checked="" type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15)	MONTH: 0 4	DAY: 3 0	YEAR: 9 8
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On December 29, 1997, while the plant was at 0% power in cold shutdown, Con Edison declared flow instrumentation associated with the liquid radwaste effluent and steam generator blowdown effluent lines to be inoperable. Indian Point Unit No. 2 Technical Specification Table 4.10-2, Items 3a and 3b requires that a channel functional test be performed at quarterly intervals for the liquid radwaste effluent line and steam generator blowdown effluent line flow instrumentation, respectively. A channel functional test is defined as the injection of a simulated signal into the channel to verify operability. A recent review of past records for these flow instruments revealed that the channel functional tests had not been performed in accordance with Technical Specification requirements. Upon discovery of this condition, new test procedures were developed and implemented to address the appropriate test methodology. The health and safety of the public were not effected by this event.

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**LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION**

FACILITY NAME (1) Indian Point No. 2	DOCKET NUMBER (2) 05000247	LER NUMBER (6)			PAGE (3)	
		YEAR 97	SEQUENTIAL NUMBER 025	REVISION NUMBER 00	2	OF 04

TEXT (If more space is required, use additional NRC Form 366A's) (17)

PLANT AND SYSTEM IDENTIFICATION:

Westinghouse 4-Loop Pressurized Water Reactor

IDENTIFICATION OF OCCURRENCE:

Inadequate Surveillance Requirements For Radioactive Liquid Effluent Monitoring Instrumentation.

EVENT DATE:

December 29, 1997

REPORT DUE DATE:

January 28, 1998

REFERENCE:

Condition Identification and Tracking System (CITRS) No. 97-E04849

PAST SIMILAR OCCURRENCES:

Licensee Event Reports (LER) 95-19, 92-005, 88-005

DESCRIPTION OF OCCURRENCE:

On December 29, 1997, while the plant was at 0% power in cold shutdown, Con Edison determined that as a result of inadequate test procedure requirements, the flow indicators associated with the liquid radwaste effluent and steam generator blowdown effluent lines should be deemed inoperable. Technical Specification Section 4.10.A. requires that each radioactive liquid effluent monitoring instrumentation channel shown in Table 4.10-2 be demonstrated operable by the performance of appropriate channel check, source check, channel calibration, and channel functional tests. Technical Specification Table 4.10-2, Items 3a and 3b require that a

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TEXT (If more space is required, use additional NRC Form 366A's) (17)

channel functional test be performed at quarterly intervals for the liquid radwaste effluent line and steam generator blowdown effluent line flow instrumentation. A channel functional test is defined as the injection of a simulated signal into the channel to verify operability. Also required to be performed at daily intervals is a channel check, which is defined as a qualitative determination of acceptable operability by observation of channel behavior during operation. A recent review by Con Edison of past records for these flow instruments revealed that the channel functional tests had not been performed in accordance with Technical Specifications. Test procedure PT-D5, "Channel Checks," is used to document the daily surveillance requirements for these flow indicators. This same procedure was erroneously used to satisfy the quarterly channel functional test. A review of past channel calibration tests was performed to determine the "as-found" calibration history for these flow instruments. Based upon the "as-found" calibration history and the fact that the channel functional test had not been conducted by the injection of a simulated signal into the channel to verify operability, the flow instruments were deemed to be inoperable. This report is provided pursuant to the requirements of 10 CFR 50.73(a)(2)(I)(B).

ANALYSIS OF OCCURRENCE:

A recent review by Con Edison of past records for these flow instruments revealed that the channel functional tests had not been performed in accordance with Technical Specifications. Test procedure PT-D5, "Channel Checks," is used to document the daily surveillance requirements for these flow indicators. This same procedure was erroneously used to satisfy the quarterly channel functional test. A review of past channel calibration tests was performed to determine the "as-found" calibration history for these flow instruments. Based upon the "as-found" calibration history and the fact that the channel functional test had not been conducted by the injection of a simulated signal into the channel to verify operability, the flow instruments were deemed to be inoperable.

CAUSE OF OCCURRENCE:

The use of erroneous test methodology was an oversight in the development of the tests. A thorough root cause analysis of this event and the identification of corrective actions will be performed. When this analysis is completed, we will provide a summary of conclusions and corrective actions in a supplement to this report.

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		YEAR 9 7 -	SEQUENTIAL NUMBER 0 2 5 -	REVISION NUMBER 0 0	4 OF	0 4

TEXT (If more space is required, use additional NRC Form 366A's) (17)

CORRECTIVE ACTIONS:

New quarterly test procedures PT-Q69, "Liquid Rad Waste Flow Functional Test," and PT-Q70, "Steam Generator Blowdown Flow Functional Test," were developed to address the Technical Specification channel functional test requirements. These tests have been satisfactorily performed. Upon the completion of these channel functional tests, all affected flow instrumentation were determined to be operable.